

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V Draft Permit No. V-99-035 Rev. 2

DAWSON MANUFACTURING COMPANY

MORGANFIELD, KY.

April 6, 2001

JIM MORSE, REVIEWER

Plant I.D. # 21-225-00064

Application Log # 53556

SOURCE DESCRIPTION:

Dawson coats rubber and metal parts for the automotive industry. The rubber and steel parts are manufactured elsewhere. Steel parts are abraded in the Wheelabrator Tumbblast units, cleaned and treated in a phosphating bath, sprayed with adhesive, and bonded to the rubber parts.

COMMENTS:

Action under this log #53556 is to restrict emissions of VOC's to less than 95 ton/yr and to permit construction of two new chain on edge coating facilities. Also the parts cleanup/materials room has been removed from the oxidizer load to achieve a better utilisation of oxidizer capacity by controlling the chain on edge facilities.

Spraying of adhesive is controlled first by particulate filters, then by catalytic oxidation. All operations will be totally enclosed and capture efficiency is 100%. Oxidizer destruction efficiency is tested at 93%.

The Tumbblast units have cartridge dust control filters with efficiency of 98%.

The phosphating process has no controls.

The R & D Spray Booth and the Parts Cleanup/Material Room are uncontrolled.

Emission factors were provided by the consultant, using a material balance. The writer has reviewed the information provided and concurs with those calculations.

Regulation 401 KAR 59:010 will apply to emissions of particulates from the Wheelabrators, the adhesive spray, the R & D Spray Booth, and the phosphating process. However, the phosphating process emissions will place that point in the insignificant activities category.

Regulation 401 KAR 59:015 applies to emissions from the two existing natural gas boilers.

PERIODIC MONITORING

VOC emission control inlet and outlet temperatures are monitored continuously

Opacity and particulate emissions are assumed to meet limits when controls are in place and functioning.

PM controls are monitored by visual inspection once per shift.

EMISSION AND OPERATING CAPS DESCRIPTION:

Dawson Manufacturing has voluntarily assumed a cap of less than 100 tons per year of VOC's to avoid applicability of Regulation 401 KAR 59:225. The source will still be major for HAP's after controlling VOC's by oxidation.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.